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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC (N.D. Cal.)

MDL No. 1917

This Document Relates to:

Electrograph Systems, Inc., et al. v. Hitachi, Ltd., et al., No. 11-cv-01656
Stoebner, et al. v. LG Electronics, et al., No. 11-cv-05381
Siegel v. Hitachi, Ltd., et al., No. 11-cv-05502
Best Buy Co., et al. v. Hitachi, Ltd., et al., No. 11-cv-05513
Target Corp., et al. v. Chunghwa Picture Tubes, Ltd., No. 11-cv-05514
Interbond Corporation of America v. Hitachi, et al., No. 11-cv-06275
Office Depot, Inc. v. Hitachi Ltd., et al., No. 11-cv-06276
CompuCom Systems, Inc. v. Hitachi, Ltd., et al., No. 11-cv-06396
Costco Wholesale Corp. v. Hitachi, Ltd., et al., No. 11-cv-06397
P.C. Richard and Son Long Island Corp., et al. v. Hitachi, Ltd., et al., No. 12-cv-02648
Schultze Agency Services, LLC, et al. v. Hitachi, Ltd., et al., No. 12-cv-02649

Case No. 11-cv-01656 SC
 Case No. 11-cv-05381 SC
 Case No. 11-cv-05502 SC
 Case No. 11-cv-05513 SC
 Case No. 11-cv-05514 SC
 Case No. 11-cv-06275 SC
 Case No. 11-cv-06276 SC
 Case No. 11-cv-06396 SC
 Case No. 11-cv-06397 SC
 Case No. 12-cv-02648 SC
 Case No. 12-cv-02649 SC

**DECLARATION OF PHILIP J. IOVIENO
 IN SUPPORT OF DIRECT ACTION
 PLAINTIFFS' OPPOSITION TO
 DEFENDANTS' JOINT MOTION TO
 DISMISS AND FOR JUDGMENT ON
 THE PLEADINGS AS TO CERTAIN
 DIRECT ACTION PLAINTIFFS'
 CLAIMS**

1 I, **PHILIP J. IOVIENO**, declare as follows:

2 1. I am a partner at the law firm of Boies, Schiller & Flexner LLP, counsel for several
3 of the Direct Action Plaintiffs (“DAPs”) in this matter, including Schultze Agency Services, LLC
4 (“Tweeter”), and I am licensed to practice law in the State of New York and admitted to practice
5 *pro hac vice* before this Court.

6 2. Attached hereto as Exhibit 1 is a true and correct copy of Tweeter’s demand letter
7 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
8 Hitachi, Ltd. by electronic mail on November 14, 2011.

9 3. Attached hereto as Exhibit 2 is a true and correct copy of Tweeter’s demand letter
10 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
11 Hitachi Displays, Ltd. by electronic mail on November 14, 2011.

12 4. Attached hereto as Exhibit 3 is a true and correct copy of Tweeter’s demand letter
13 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
14 Hitachi America, Ltd. by electronic mail on November 14, 2011.

15 5. Attached hereto as Exhibit 4 is a true and correct copy of Tweeter’s demand letter
16 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
17 Hitachi Asia, Ltd. by electronic mail on November 14, 2011.

18 6. Attached hereto as Exhibit 5 is a true and correct copy of Tweeter’s demand letter
19 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
20 Hitachi Electronic Devices (USA), Inc. by electronic mail on November 14, 2011.

21 7. Attached hereto as Exhibit 6 is a true and correct copy of Tweeter’s demand letter
22 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
23 Shenzhen SEG Hitachi Color Display Devices, Ltd. by electronic mail on November 14, 2011.

24 8. Attached hereto as Exhibit 7 is a true and correct copy of Tweeter’s demand letter
25 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
26 IRICO Group Corporation by electronic mail on November 14, 2011.

1 9. Attached hereto as Exhibit 8 is a true and correct copy of Tweeter's demand letter
2 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
3 IRICO Group Electronics Co., Ltd. by electronic mail on November 14, 2011.

4 10. Attached hereto as Exhibit 9 is a true and correct copy of Tweeter's demand letter
5 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
6 IRICO Display Devices Co., Ltd. by electronic mail on November 14, 2011.

7 11. Attached hereto as Exhibit 10 is a true and correct copy of Tweeter's demand letter
8 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
9 LG Electronics, Inc. by electronic mail on November 14, 2011.

10 12. Attached hereto as Exhibit 11 is a true and correct copy of Tweeter's demand letter
11 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
12 LG Electronics USA, Inc. by electronic mail on November 14, 2011.

13 13. Attached hereto as Exhibit 12 is a true and correct copy of Tweeter's demand letter
14 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
15 LG Electronics Taiwan Taipei Co., Ltd. by electronic mail on November 14, 2011.

16 14. Attached hereto as Exhibit 13 is a true and correct copy of Tweeter's demand letter
17 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
18 LP Displays International Ltd. by electronic mail on November 14, 2011.

19 15. Attached hereto as Exhibit 14 is a true and correct copy of Tweeter's demand letter
20 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
21 Panasonic Corporation by electronic mail on November 14, 2011.

22 16. Attached hereto as Exhibit 15 is a true and correct copy of Tweeter's demand letter
23 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
24 Panasonic Corporation of North America by electronic mail on November 14, 2011.

25 17. Attached hereto as Exhibit 16 is a true and correct copy of Tweeter's demand letter
26 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
27 MT Picture Display Co., Ltd. by electronic mail on November 14, 2011.
28

1 18. Attached hereto as Exhibit 17 is a true and correct copy of Tweeter's demand letter
2 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
3 Beijing Matsushita Color CRT Co., Ltd. by electronic mail on November 14, 2011.

4 19. Attached hereto as Exhibit 18 is a true and correct copy of Tweeter's demand letter
5 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
6 Koninklijke Philips Electronics N.V. by electronic mail on November 14, 2011.

7 20. Attached hereto as Exhibit 19 is a true and correct copy of Tweeter's demand letter
8 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
9 Philips Electronics North America Corporation by electronic mail on November 14, 2011.

10 21. Attached hereto as Exhibit 20 is a true and correct copy of Tweeter's demand letter
11 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
12 Philips Electronics Industries (Taiwan), Ltd. by electronic mail on November 14, 2011.

13 22. Attached hereto as Exhibit 21 is a true and correct copy of Tweeter's demand letter
14 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
15 Philips da Amazonia Industria Electronica Ltda. by electronic mail on November 14, 2011.

16 23. Attached hereto as Exhibit 22 is a true and correct copy of Tweeter's demand letter
17 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
18 Samsung Electronics Co., Ltd. by electronic mail on November 14, 2011.

19 24. Attached hereto as Exhibit 23 is a true and correct copy of Tweeter's demand letter
20 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
21 Samsung Electronics America, Inc. by electronic mail on November 14, 2011.

22 25. Attached hereto as Exhibit 24 is a true and correct copy of Tweeter's demand letter
23 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
24 Samsung SDI Co., Ltd. by electronic mail on November 14, 2011.

25 26. Attached hereto as Exhibit 25 is a true and correct copy of Tweeter's demand letter
26 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
27 Samsung SDI America, Inc by electronic mail on November 14, 2011.
28

1 27. Attached hereto as Exhibit 26 is a true and correct copy of Tweeter's demand letter
2 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
3 Samsung SDI Mexico S.A. de C.V. by electronic mail on November 14, 2011.

4 28. Attached hereto as Exhibit 27 is a true and correct copy of Tweeter's demand letter
5 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
6 Samsung SDI Brasil Ltda. by electronic mail on November 14, 2011.

7 29. Attached hereto as Exhibit 28 is a true and correct copy of Tweeter's demand letter
8 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
9 Shenzhen Samsung SDI Co., Ltd. by electronic mail on November 14, 2011.

10 30. Attached hereto as Exhibit 29 is a true and correct copy of Tweeter's demand letter
11 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
12 Tianjin Samsung SDI Co., Ltd. by electronic mail on November 14, 2011.

13 31. Attached hereto as Exhibit 30 is a true and correct copy of Tweeter's demand letter
14 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
15 Samsung SDI (Malaysia) Sdn. Bhd. by electronic mail on November 14, 2011.

16 32. Attached hereto as Exhibit 31 is a true and correct copy of Tweeter's demand letter
17 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
18 Samtel Color Ltd. by electronic mail on November 14, 2011.

19 33. Attached hereto as Exhibit 32 is a true and correct copy of Tweeter's demand letter
20 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
21 Toshiba Corporation by electronic mail on November 14, 2011.

22 34. Attached hereto as Exhibit 33 is a true and correct copy of Tweeter's demand letter
23 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
24 Toshiba America, Inc. by electronic mail on November 14, 2011.

25 35. Attached hereto as Exhibit 34 is a true and correct copy of Tweeter's demand letter
26 under Section 9 of Chapter 93A of the Massachusetts General Laws, which was sent to counsel for
27 Toshiba America Consumer Products, LLC by electronic mail on November 14, 2011.
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